

# EXHIBIT C

**SHER TREMONTTE LLP**

May 10, 2025

**BY EMAIL**

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**Re: *American Association of University Professors, et al., v. Rubio, et al.***  
**No. 25-cv-10685 (D. Mass.)**

Dear Counsel,

Thank you for your time during yesterday's meet and confer. I write to memorialize some of the topics we discussed on the call and to advise you of our anticipated next steps.

As I stated yesterday, we intend to serve targeted discovery requests related to the three individuals identified by Judge Young at the last case management conference (Khalil; Mahdawi; and Ozturk), as well as the additional individuals identified in our Complaint (Chung; Suri; Taal; Srinivasan). As you know, Judge Young specifically directed that he "expect[s] every contemporaneous document that exists up and down the chain of command within the government's bureaucracy" relating to the targeting and attempted removal of these individuals, Tr. 17-18, and our targeted discovery requests will be in line with the Court's expectations. We also expect that the government will provide us with the names, titles, and roles of the key personnel involved in those removals.

Because those individuals have each been the subject of litigation, we expect that the government has already identified relevant documents responsive to plaintiffs' requests in those matters. Further, we are aware that you have asserted privilege over certain of those documents in those other litigations.<sup>1</sup> As I said on the call, we would like

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<sup>1</sup> For example, Ms. Ozturk sought two agency memoranda that directly addressed the government's basis for targeting her, and the government objected to the disclosure of the memoranda based on the deliberative process privilege and 8 U.S.C. § 1202(f). See

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to get to the forefront of any privilege issues quickly so that we can put them before the Court in time for the May 22 conference, so we would appreciate it if you could let us know quickly whether you intend to assert similar privileges over the documents at issue here.

You agreed to discuss the possibility of stipulating to the accuracy of the government statements cited in the complaint with the relevant agencies.

You agreed to confer with your agencies and propose a counteroffer to our proposed schedule by EOD Monday.

You agreed to consider a protective order. Accordingly, simultaneously with this letter we are providing you with a draft of the proposed protective order. We would appreciate a response from you on that as well by EOD Monday.

We would like to schedule a call for **Tuesday morning, May 13**, to discuss the proposed schedule and protective order. We also intend to get you our initial document requests before that date so we can discuss them in detail on the call.

Thank you and have a good weekend.

Yours very truly,

/s/Noam Biale  
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